



Nixon Peabody LLP
275 Broadhollow Road, Suite 300
Melville, NY 11747-4808

Timothy D. Sini
Partner

Attorneys at Law
nixonpeabody.com
@NixonPeabodyLLP

T / 516.832.7655
F / 833.875.0420
tsini@nixonpeabody.com

September 10, 2024

VIA ECF

MEMO ENDORSED

The Honorable Edgardo Ramos, U.S.D.J.
United States District Court
for the Southern District of New York
40 Foley Square, Room 415
New York, NY 10007

RE: *Morgulis v. Bus Patrol America, LLC*, Case No. 24-CV-00113-ER

Dear Judge Ramos:

This Firm represents defendant BusPatrol America, LLC s/h/a Bus Patrol America, LLC ("Defendant"). We write to request a second short adjournment of the pre-motion conference currently scheduled for Thursday, September 12, 2024 at 10:00 a.m. The reason for this request is that I will be travelling internationally for a different matter that day. I am available on the following days:

- Friday, September 13, 2024
- Wednesday, September 18, 2024
- Thursday, September 19, 2024

This is the second request for an adjournment of this pre-motion conference. The first request was made by Plaintiff with consent of Defendant. Plaintiff consents to this request.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Timothy D. Sini".

Timothy D. Sini

cc: Martin Bienstock and Joseph H. Aron (via ECF)

The pre-motion conference is adjourned to September 19, 2024, at 11 a.m. The parties are instructed to call (877) 411-9748 and enter access code 3029857# when prompted.

SO ORDERED.

4854-6795-1075.1

A handwritten signature in blue ink, appearing to read "Edgardo Ramos".

Edgardo Ramos, U.S.D.J.

Dated: 9/11/2024

New York, New York